

III. REMARKS

Claims 1-14 are pending in this application. By this amendment, claims 1, 7, 13 and 14 have been amended. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1-14 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Shear (U.S. Patent No. 5,627,972), hereafter “Shear,” in view of Ogawa *et al.* (U.S. Patent No. 5,608,874), hereafter “Ogawa.” Applicants respectfully traverse the rejections for the following reasons.

Initially, Applicants respectfully submit that the U.S. Patent Number for the Ogawa reference should be 5,608,874 and not 6,608,874 as recited in the Office Action.

With regard to the 35 U.S.C. §103(a) rejection over Shear in view of Ogawa, Applicants submit that the references cited by the Office do not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 7, 13 and 14, Applicants submit that Shear fails to teach, *inter alia*, means for determining the compatibility of each field of each

of said plurality of input message formats with one or more fields of said plurality of output message formats by comparing at least one of a name of each field of said plurality of input message formats with names of fields in the representative samples of messages and a type of each field of said plurality of input message formats with types of fields in the representative samples of messages, as amended. In contrast, the passage of Shear cited by the Office, although teaching "...output messages which are translated or transformed from a first message format or strudcture into a seccond and dissimilar message format or structure," (col. 5, lines 3-5; see also col. 3, lines 40-59 and col. 4, line 64 through col. 5, line 9) does not teach or suggest that this transformation is performed using the comparision of field names and/or types of the claimed invention. Accordingly, Applicants respectfully request withdrawal of the Office's rejection.

With further respect to independent claims 1, 7, 13 and 14, Applicants submit that Shear fails to teach, *inter alia*, means for analysing the message fields in the representative samples of messages stored in said message log to get a statistical analysis of the values of the message fields by examining values of data in the message fields of the representative samples of messages in an input message format with values of data in the message fields of the representative samples of messages for the plurality of output message formats, as amended. The Office cites a passage of Shear that teaches "...a data interchange system, adapted to receive a message having a first data format, to receivably store the first message, and to translate the received message into a second data structure or format, at a predefined later time." Col. 2, lines 28-32. To this extent, Shear teaches storing a received message for later translation and not storing a representative message for use in performing the translation.

The Office further cites a passage of Shear that includes "...an archiving system, which allows for the selective storing of message 16, 18," and a separate modeling system that "...includes a model database which is adapted to include, as will be shown, various data models associated with the hierarchical level of message 16. In the preferred embodiment of this invention, these included data models are used to parse and transform message 16 into the format utilized by message 18." Col. 4, lines 6-7, 24-29. To this extent, the archiving system of Shear does not store representative samples of messages, but rather, the message 16 to be translated and the message 18 that has been translated. Furthermore, to the extent that the Office equates the included data models with the representative samples of the claimed invention, Shear does not teach or suggest that its included data models include samples of messages in the format of the message to be translated and samples of messages in a plurality of formats to which the message may be translated or the data in fields of sample messages that are in the format of its message to be translated are compared with data in fields of sample messages that are in the plurality of formats to which the message may be translated. Accordingly, Applicants request that the Office's rejection be withdrawn.

With further respect to independent claims 1, 7, 13 and 14, Applicants respectfully submit that Ogawa fails to teach, *inter alia*, getting a statistical analysis of the values of the message fields in the message log by comparing values of data in the message fields of the representative samples of messages in an input message format with values of data in the message fields of the representative samples of messages for the plurality of output message formats, as amended. The passage of Ogawa cited by the Office merely teaches that "...logical, statistical and mathematical operations may be performed on the data." Col. 2, lines 64-65. However, these operations are

performed on the data itself, and not on representative samples of messages stored in a log file. Furthermore, nowhere in the passage cited by the Office or elsewhere does Ogawa teach or suggest that its logical, statistical and mathematical operations are performed by examining sample values of fields in messages in the input format and sample values of fields in messages in various output formats. Accordingly, Applicants request that the Office's rejection be withdrawn.

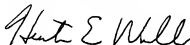
With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the dependent claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



Hunter E. Webb
Reg. No.: 54,593

Date: October 2, 2006

Hoffman, Warnick & D'Alessandro LLC
75 State Street, 14th Floor
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)

RAD/hew